

Wade D. Hutchings
Alaska Asset Manager



Marathon Alaska Production LLC
P.O. Box 1949
Kenai, AK 99611
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December 10, 2011

Mr. Mike Bussell
Director, Office of Water and Watersheds
United States Environmental Protection Agency, Region 10
1200 Sixth Avenue, M/S OWW-130
Seattle, Washington 98101

DEC 13 2011

Alaska Department of Environmental Conservation, Water Division
555 Cordova Street
Anchorage, Alaska 99501

RE: Signature Authority
National Pollutant Discharge Elimination System (NPDES)
General Permit ACG-31-5000

Dear Director:

This letter serves to confirm that Wade D. Hutchings, Marathon Alaska Production Manager who also serves as President of Marathon Alaska Production LLC, has responsible charge in accordance with NPDES General Permit ACG-31-5000 for oil and gas extraction facilities in federal and state waters in Cook Inlet, Section VIII, Part E.1.a which states that all applications submitted to the Director and ADEC must be signed and certified by a responsible corporate officer.

Mr. Hutchings is responsible for the overall operation of all Marathon Oil production and operating facilities in Alaska.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

A handwritten signature of Wade D. Hutchings in cursive script.

Wade D. Hutchings

12.9.2011
Date

RGK
By Federal Express

cc File E.490.57.1
File E.520.57.1

Marathon Alaska Production LLC
P.O. Box 1949
Kenai, AK 99611



December 10, 2011

Mr. Mike Bussell
Director, Office of Water and Watersheds
United States Environmental Protection Agency, Region 10
1200 Sixth Avenue, M/S OWW-130
Seattle, Washington 98101

DEC 13 2011

**RE: Notice of Intent (NOI) for coverage under new NPDES General Permit
Per NPDES General Permit AKG-31-5000, Section VIII, B
Spark Platform**

Dear Mr. Bussell:

Marathon is submitting this Notice of Intent (NOI) to be covered under a new general permit for our Spark Platform. Spark Platform is currently covered under NPDES General Permit for Oil and Gas Extraction Facilities in Federal and State Waters in Cook Inlet (AKG-31-5000), which expires July 2, 2012. This NOI is being submitted as required by Section VIII, Part B of the referenced permit.

Please contact me at 907-283-1339 or rgkincaid@marathonoil.com with any questions or to discuss further.

Sincerely,

A handwritten signature in black ink, appearing to read 'Regina Kincaid'.

Regina Kincaid
HES Professional

Enclosure

Notice of Intent Information with Certification (4 pages)
Signature Authority letter
Location Map
Discharge Diagram
Disposal Discharge Description

RGK
By Federal Express

CC: ADEC, Water Division
File E.490.57.1, w/enclosures

NOTICE OF INTENT (NOI) INFORMATION SHEET
NPDES GENERAL PERMIT AKG-31-5000
OIL AND GAS EXPLORATION FACILITIES
ON THE OUTER CONTINENTAL SHELF AND CONTIGUOUS STATE WATERS

APPLICANT (Owner/Operator)					
Owner Name:	Marathon Alaska Production, LLC	Operator Mailing Address:	Marathon Alaska Production, LLC		
Telephone Number:	(907) 565-3070		PO Box 1949		
Operator Name:	Marathon Alaska Production, LLC		Kenai, AK 99611		
Telephone Number:	(907) 565-3070				
FACILITY					
Facility Name:	Spark Platform	Facility Mailing Address:	Marathon Alaska Production, LLC		
Contact Name:	Regina Kincaid		PO Box 1949		
Telephone Number:	(907) 283-1339		Kenai, AK 99611		
Beginning Date of Operation:	1968	Stationary Facilities	Latitude:	60° 55' 42" N	
Expected Duration of Operation:	not in operation		Longitude :	151° 31' 50" W	
Facility Type (check applicable type)	<input type="checkbox"/> Jackup	Mobile Facilities	Initial Latitude:		
	<input type="checkbox"/> Drill Ship		Initial Longitude :		
	<input type="checkbox"/> Semisubmersible				
	<input checked="" type="checkbox"/> Other (specify): Platform				
<p>Submit a site map showing the exact location of facility and discharges associated with the project. Mobile facilities may designate an area where they may be operating and must include a map showing those areas and a description of operations within those areas. If the operation is within 4000 meters of a prohibited area of discharge indicated by the permit, those areas and their distance from the operation must be shown on the map.</p>					
RECEIVING WATER – Cook Inlet					
<input type="checkbox"/> Coastal Waters		<input type="checkbox"/> Territorial Seas			
<input checked="" type="checkbox"/> Offshore Waters					
Initial date and expected duration of operations:					
LOCATION OF DISCHARGE					
MMS	Lease Number		ADNR	Lease Number	North Trading Bay Unit Tract #1 ADL 35431
	Block Number			Block Number	T10N, R13W, Section 26
Range of water depths below mean lower low water (MLLW) in the lease block:		From:	0	To:	0

DEC 13 2011

NOTICE OF INTENT (NOI) INFORMATION SHEET
NPDES GENERAL PERMIT AKG-31-5000
OIL AND GAS EXPLORATION FACILITIES
ON THE OUTER CONTINENTAL SHELF AND CONTIGUOUS STATE WATERS

Discharges (check all that apply)					
<input type="checkbox"/>	001 Drilling Mud and Cuttings	Water Depth:			
<input checked="" type="checkbox"/>	002 Deck Drainage	Water Depth:	surface		
<input type="checkbox"/>	003 Sanitary Waste	Water Depth:			
<input type="checkbox"/>	004 Domestic Waste	Water Depth:			
<input type="checkbox"/>	005 Desalination Unit Waste	Water Depth:			
<input type="checkbox"/>	006 Blowout Preventer Fluid	Water Depth:			
<input type="checkbox"/>	007 Boiler Blowdown	Water Depth:			
<input type="checkbox"/>	008 Fire Control System Test Water	Water Depth:			
<input type="checkbox"/>	009 Non-Contact Cooling Water	Water Depth:			
<input type="checkbox"/>	010 Uncontaminated Ballast Water	Water Depth:			
<input type="checkbox"/>	011 Bilge Water	Water Depth:			
<input type="checkbox"/>	012 Excess Cement Slurry	Water Depth:			
<input type="checkbox"/>	013 Mud, Cuttings, Cement at Seafloor	Water Depth:			
<input type="checkbox"/>	014 Waterflooding Discharges	Water Depth:			
<input type="checkbox"/>	015 Produced Water and Produced Sand	Water Depth:			
<input type="checkbox"/>	016 Completion Fluids	Water Depth:			
<input type="checkbox"/>	017 Workover Fluids	Water Depth:			
<input type="checkbox"/>	018 Well Treatment Fluids	Water Depth:			
<input type="checkbox"/>	019 Test Fluids	Water Depth:			
Type of Sanitary Discharge: <input type="checkbox"/> M10 <input type="checkbox"/> M91M <input checked="" type="checkbox"/> Other (specify): Facility unmanned					
Provide a brief description of the treatment process(es) and disposal practices (e.g., backhauled, reinjected, discharged, etc.) at the facility.					
Provide a line drawing that shows flows of discharged waste streams through the facility. Indicate intake sources, operations contributing to the effluent, and treatment units labeled to correspond to the discharges (001 - 019). Construct a flow balance on the line drawing by showing average flows between intakes, operations, treatment units, and outfalls. If a flow balance cannot be determined, provide a pictorial description of the nature and amount of any sources, and any collection or treatment measures.					
Drilling Fluid					
Category <i>(check all that apply)</i>	<input type="checkbox"/>	Water-based	Group <i>(check all that apply)</i>	<input type="checkbox"/>	Lignosulfonate
	<input type="checkbox"/>	Oil-based		<input type="checkbox"/>	Lime
	<input type="checkbox"/>	Synthetic-based		<input type="checkbox"/>	Gyp
	<input type="checkbox"/>	Other (specify):		<input type="checkbox"/>	Sea-water
Estimated Total Discharge Volume:			<input type="checkbox"/>	Saltwater	
			<input type="checkbox"/>	Saturated Saltwater	
			<input type="checkbox"/>	Nondispersed (Viscosifier/Polymer)	

NOTICE OF INTENT (NOI) INFORMATION SHEET
NPDES GENERAL PERMIT AKG-31-5000
OIL AND GAS EXPLORATION FACILITIES
ON THE OUTER CONTINENTAL SHELF AND CONTIGUOUS STATE WATERS

100-Meter Mixing Zone Request*(applicable to sanitary discharges within State of Alaska/Coastal Waters)*

Are you requesting a mixing zone from ADEC?	<input type="checkbox"/>	Yes (continue filling out this section)	<input checked="" type="checkbox"/>	No (skip this section and proceed to Special Conditions, below)
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THE FOLLOWING INFORMATION MUST BE PROVIDED IF REQUESTING A MIXING ZONE. The burden of proof for justifying a mixing zone through demonstrating compliance with the requirements of 18 AAC 70.240 through 18 AAC 70.270 rests with the applicant.

Distance from shoreline of discharge point or first port of diffuser (measured at M.L.L.W.):		Length of diffuser:	
Depth of discharge port or diffuser (measured at M.L.L.W.):		Diameter of port(s):	
Orientation of diffuser to shoreline (e.g., perpendicular, 45°, parallel):		Number of ports:	
Maximum current:		Port spacing:	

USES OF RECEIVING WATER AT DISTANCE FROM DIFFUSER i.e. Supply for drinking water, Supply for agriculture including irrigation & stock water, Supply for aquaculture, Supply for industrial use, Contact recreation, Secondary recreation, Fish spawning, Harvesting and consumption of raw fish, or other aquatic life (Not needed if not requesting a mixing zone from ADEC):

If possible, provide salinity and temperature data from the receiving water surface to the depth of the discharge port or diffuser.

Special Conditions (provide justification for all that are not required, completed or provided)

Special Monitoring	<input type="checkbox"/>	Required	<input type="checkbox"/>	Not Required	Justification:
Exploration Plans	<input type="checkbox"/>	Attached	<input type="checkbox"/>	Not Provided	Justification:
Biological Survey(s)	<input type="checkbox"/>	Attached	<input type="checkbox"/>	Not Provided	Justification:
Environmental Report(s)	<input type="checkbox"/>	Attached	<input type="checkbox"/>	Not Provided	Justification:
Drilling Fluid Plan	<input type="checkbox"/>	Complete	<input type="checkbox"/>	Not Complete	Justification:
Environmental Monitoring Study Plan (U.B.5.)	<input type="checkbox"/>	Attached	Date of Submittal: _____		

NOTICE OF INTENT (NOI) INFORMATION SHEET
NPDES GENERAL PERMIT AKG-31-5000
OIL AND GAS EXPLORATION FACILITIES
ON THE OUTER CONTINENTAL SHELF AND CONTIGUOUS STATE WATERS

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

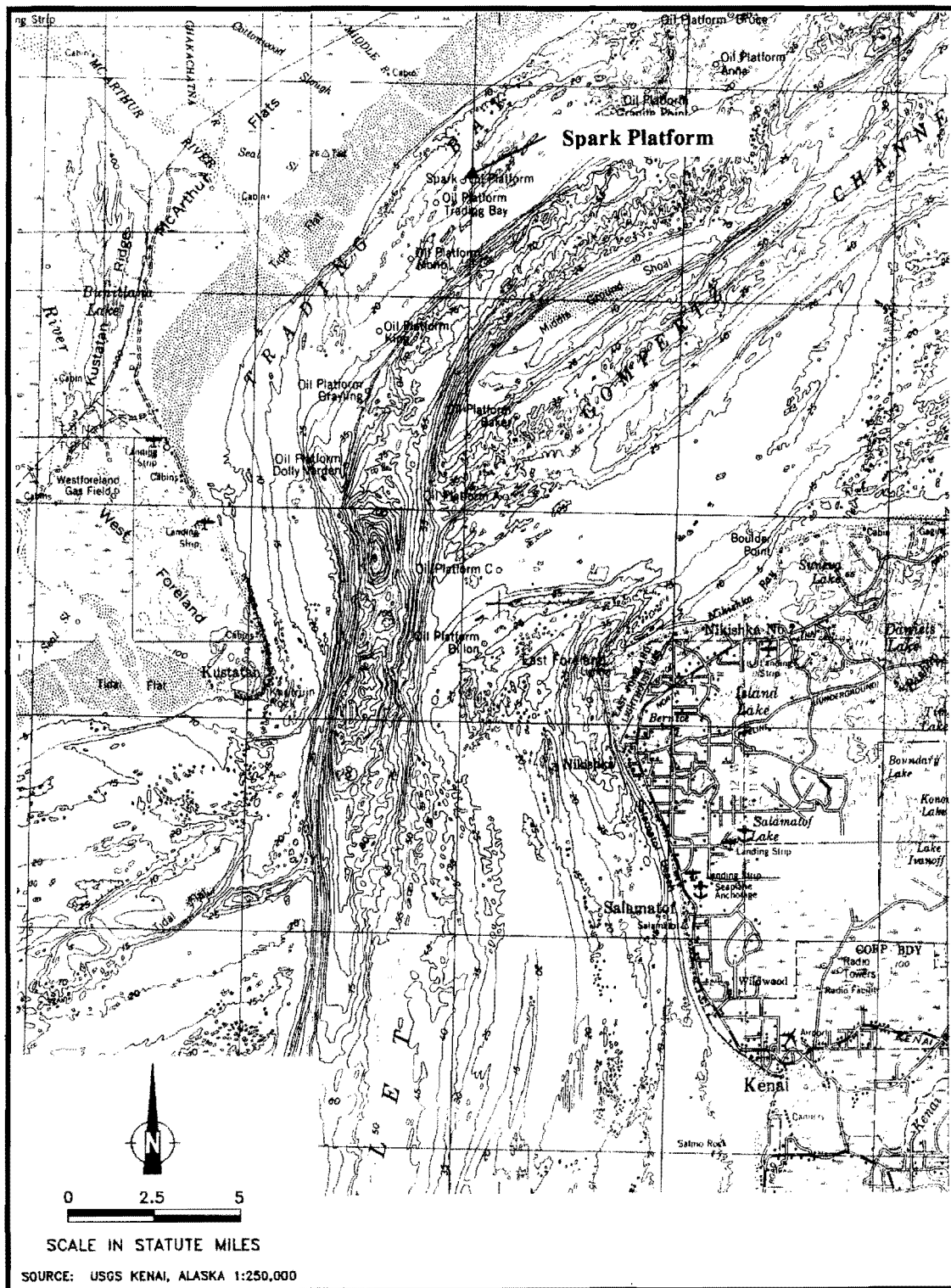
Signature:	<i>Wade D. Hutchings</i>	Date:	12 - 9 - 11
Printed Name:	Wade D. Hutchings	Title:	Alaska Asset Manager

Mail Completed NOI to EPA and ADEC at the following addresses:

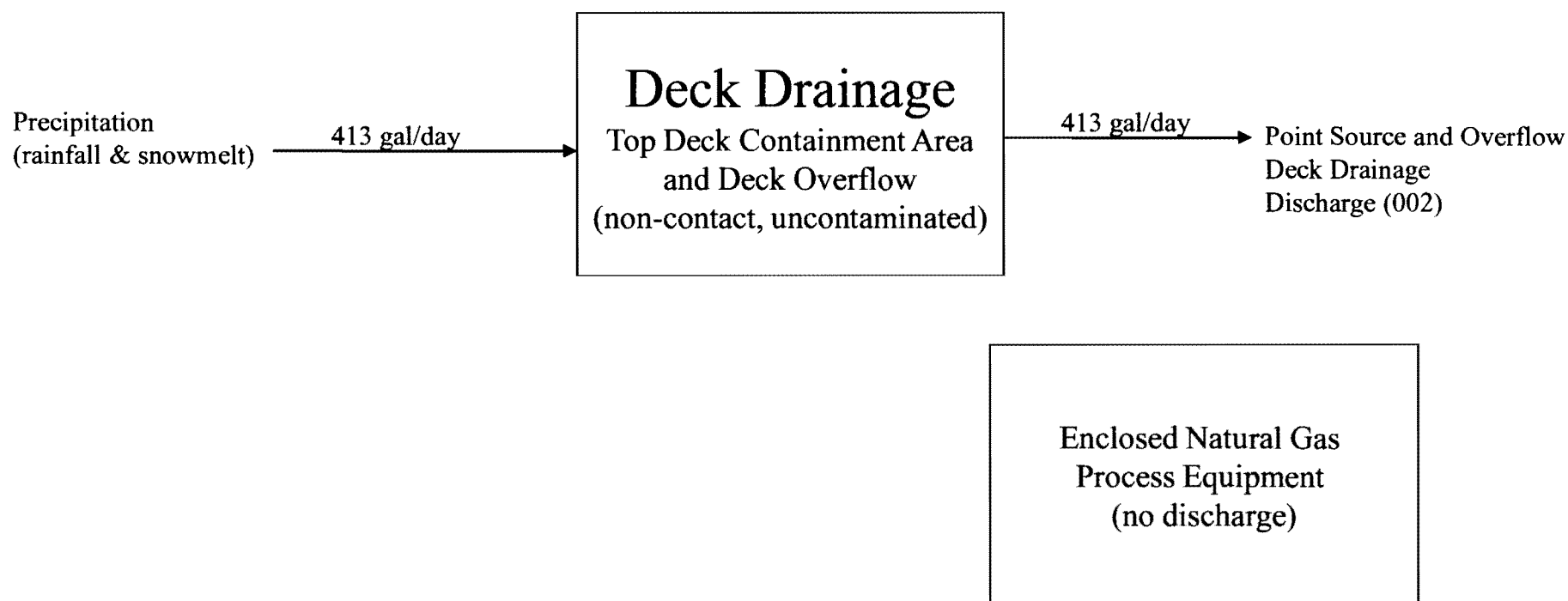
US EPA
1200 6th Avenue, M/S OWW-130
Seattle, WA 98101

ADEC, Water Division
555 Cordova Street
Anchorage, Alaska 99501

151° 31' 50" W Longitude



Line Drawing – Spark Platform



Note:

Average flow is estimated and based on historical climate data from the Kenai FAA Airport. Specifically, an average of 19.07 in/year of total precipitation from 1949 to 2005. Flow has been estimated by the average rainfall and the surface area of the platform less grating.

I. Potential Release Types: There is one potential discharge category covered by the General NPDES Permit for the Spark Platform. This waste stream is managed in such a way as to comply with permit limits and/or eliminate discharges to Cook Inlet. This facility is unmanned, not operational, and all wells are plugged and abandoned.

Discharge 002 Deck Drainage These discharges are segregated from other compliance operations to keep the deck drainage from becoming contaminated. The abandoned production wells are enclosed in weatherproof housing with spill containment berms. Leaks and spills into the berms are cleaned-up by maintenance personnel. Stormwater and snowmelt that accumulates on the drill deck does not naturally shed, so this collected water is checked and monitored for any sheen prior to discharge. The water is discharged by removing one deck drain plug during monthly operator rounds.

Diesel fuel used to operate the back-up generator is stored in a 400-gallon storage tank, inside weatherproof housing with spill containment berms. Drums containing fluids necessary for the safe operation of the facility are stored inside weatherproof housing and/or on drum "spill containment pallets". Empty drums are plugged and labeled "empty." Used drums are removed from the facility as soon as practicable.

Marathon Alaska Production LLC
P.O. Box 1949
Kenai, AK 99611



December 10, 2011

Mr. Mike Bussell
Director, Office of Water and Watersheds
United States Environmental Protection Agency, Region 10
1200 Sixth Avenue, M/S OWW-130
Seattle, Washington 98101

**RE: Notice of Intent (NOI) for coverage under new NPDES General Permit
Per NPDES General Permit AKG-31-5000, Section VIII, B
Spurr Platform**

Dear Mr. Bussell:

Marathon is submitting this Notice of Intent (NOI) to be covered under a new general permit for our Spurr Platform. Spurr Platform is currently covered under NPDES General Permit for Oil and Gas Extraction Facilities in Federal and State Waters in Cook Inlet (AKG-31-5000), which expires July 2, 2012. This NOI is being submitted as required by Section VIII, Part B of the referenced permit.

Please contact me at 907-283-1339 or rgkincaid@marathonoil.com with any questions or to discuss further.

Sincerely,

A handwritten signature in black ink, appearing to read 'Regina Kincaid'.

Regina Kincaid
HES Professional

Enclosure

Notice of Intent Information with Certification (4 pages)
Signature Authority Letter
Location Map
Discharge Diagram
Discharge Disposal Description

RGK
By Federal Express

CC: ADEC Water Division, w/enclosures
File E.520.57.1, w/enclosures

NOTICE OF INTENT (NOI) INFORMATION SHEET
NPDES GENERAL PERMIT AKG-31-5000
OIL AND GAS EXPLORATION FACILITIES
ON THE OUTER CONTINENTAL SHELF AND CONTIGUOUS STATE WATERS

APPLICANT (Owner/Operator)					
Owner Name:	Marathon Alaska Production, LLC	Operator Mailing Address:	Marathon Alaska Production, LLC		
Telephone Number:	(907) 565-3070		PO Box 1949		
Operator Name:	Marathon Alaska Production, LLC		Kenai, AK 99611		
Telephone Number:	(907) 565-3070				
FACILITY					
Facility Name:	Spurr Platform	Facility Mailing Address:	Marathon Alaska Production, LLC		
Contact Name:	Regina Kincaid		PO Box 1949		
Telephone Number:	(907) 283-1339		Kenai, AK 99611		
Beginning Date of Operation:	1968	Stationary Facilities	Latitude:	60° 55' 10" N	
Expected Duration of Operation:	not in operation		Longitude:	151° 33' 26" W	
Facility Type <i>(check applicable type)</i>	<input type="checkbox"/> Jackup	Mobile Facilities	Initial Latitude:		
	<input type="checkbox"/> Drill Ship		Initial Longitude:		
	<input type="checkbox"/> Semisubmersible				
	<input checked="" type="checkbox"/> Other (specify): Platform				
<p>Submit a site map showing the exact location of facility and discharges associated with the project. Mobile facilities may designate an area where they may be operating and must include a map showing those areas and a description of operations within those areas. If the operation is within 4000 meters of a prohibited area of discharge indicated by the permit, those areas and their distance from the operation must be shown on the map.</p>					
RECEIVING WATER – Cook Inlet					
<input type="checkbox"/> Coastal Waters		<input type="checkbox"/> Territorial Seas			
<input checked="" type="checkbox"/> Offshore Waters					
Initial date and expected duration of operations:					
LOCATION OF DISCHARGE					
MMS	Lease Number		ADNR	Lease Number	North Trading Bay Unit Tract #3 ADL 17597
	Block Number			Block Number	T10N, R13W, Section 34
Range of water depths below mean lower low water (MLLW) in the lease block:		From:	0	To:	0

NOTICE OF INTENT (NOI) INFORMATION SHEET
NPDES GENERAL PERMIT AKG-31-5000
OIL AND GAS EXPLORATION FACILITIES
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Discharges (check all that apply)					
<input type="checkbox"/>	001 Drilling Mud and Cuttings	Water Depth:			
<input checked="" type="checkbox"/>	002 Deck Drainage	Water Depth:	Surface		
<input type="checkbox"/>	003 Sanitary Waste	Water Depth:			
<input type="checkbox"/>	004 Domestic Waste	Water Depth:			
<input type="checkbox"/>	005 Desalination Unit Waste	Water Depth:			
<input type="checkbox"/>	006 Blowout Preventer Fluid	Water Depth:			
<input type="checkbox"/>	007 Boiler Blowdown	Water Depth:			
<input type="checkbox"/>	008 Fire Control System Test Water	Water Depth:			
<input type="checkbox"/>	009 Non-Contact Cooling Water	Water Depth:			
<input type="checkbox"/>	010 Uncontaminated Ballast Water	Water Depth:			
<input type="checkbox"/>	011 Bilge Water	Water Depth:			
<input type="checkbox"/>	012 Excess Cement Slurry	Water Depth:			
<input type="checkbox"/>	013 Mud, Cuttings, Cement at Seafloor	Water Depth:			
<input type="checkbox"/>	014 Waterflooding Discharges	Water Depth:			
<input type="checkbox"/>	015 Produced Water and Produced Sand	Water Depth:			
<input type="checkbox"/>	016 Completion Fluids	Water Depth:			
<input type="checkbox"/>	017 Workover Fluids	Water Depth:			
<input type="checkbox"/>	018 Well Treatment Fluids	Water Depth:			
<input type="checkbox"/>	019 Test Fluids	Water Depth:			
Type of Sanitary Discharge: <input type="checkbox"/> M10 <input type="checkbox"/> M91M <input checked="" type="checkbox"/> Other (specify): Facility unmanned					
Provide a brief description of the treatment process(es) and disposal practices (e.g., backhauled, reinjected, discharged, etc.) at the facility.					
Provide a line drawing that shows flows of discharged waste streams through the facility. Indicate intake sources, operations contributing to the effluent, and treatment units labeled to correspond to the discharges (001 - 019). Construct a flow balance on the line drawing by showing average flows between intakes, operations, treatment units, and outfalls. If a flow balance cannot be determined, provide a pictorial description of the nature and amount of any sources, and any collection or treatment measures.					
Drilling Fluid					
Category <i>(check all that apply)</i>	<input type="checkbox"/>	Water-based	Group <i>(check all that apply)</i>	<input type="checkbox"/>	Lignosulfonate
	<input type="checkbox"/>	Oil-based		<input type="checkbox"/>	Lime
	<input type="checkbox"/>	Synthetic-based		<input type="checkbox"/>	Gyp
	<input type="checkbox"/>	Other (specify):		<input type="checkbox"/>	Sea-water
Estimated Total Discharge Volume:			<input type="checkbox"/>	Saltwater	
			<input type="checkbox"/>	Saturated Saltwater	
			<input type="checkbox"/>	Nondispersed (Viscosifier/Polymer)	

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NPDES GENERAL PERMIT AKG-31-5000
OIL AND GAS EXPLORATION FACILITIES
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100-Meter Mixing Zone Request*(applicable to sanitary discharges within State of Alaska/Coastal Waters)*

Are you requesting a mixing zone from ADEC?	<input type="checkbox"/>	Yes (continue filling out this section)	<input checked="" type="checkbox"/>	No (skip this section and proceed to Special Conditions, below)
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THE FOLLOWING INFORMATION MUST BE PROVIDED IF REQUESTING A MIXING ZONE. The burden of proof for justifying a mixing zone through demonstrating compliance with the requirements of 18 AAC 70.240 through 18 AAC 70.270 rests with the applicant.

Distance from shoreline of discharge point or first port of diffuser (measured at M.L.L.W.):		Length of diffuser:	
Depth of discharge port or diffuser (measured at M.L.L.W.):		Diameter of port(s):	
Orientation of diffuser to shoreline (e.g., perpendicular, 45°, parallel):		Number of ports:	
Maximum current:		Port spacing:	

USES OF RECEIVING WATER AT DISTANCE FROM DIFFUSER i.e. Supply for drinking water, Supply for agriculture including irrigation & stock water, Supply for aquaculture, Supply for industrial use, Contact recreation, Secondary recreation, Fish spawning, Harvesting and consumption of raw fish, or other aquatic life (Not needed if not requesting a mixing zone from ADEC):

If possible, provide salinity and temperature data from the receiving water surface to the depth of the discharge port or diffuser.

Special Conditions *(provide justification for all that are not required, completed or provided)*

Special Monitoring	<input type="checkbox"/>	Required	<input type="checkbox"/>	Not Required	Justification:
Exploration Plans	<input type="checkbox"/>	Attached	<input type="checkbox"/>	Not Provided	Justification:
Biological Survey(s)	<input type="checkbox"/>	Attached	<input type="checkbox"/>	Not Provided	Justification:
Environmental Report(s)	<input type="checkbox"/>	Attached	<input type="checkbox"/>	Not Provided	Justification:
Drilling Fluid Plan	<input type="checkbox"/>	Complete	<input type="checkbox"/>	Not Complete	Justification:
Environmental Monitoring Study Plan (ILB.5.)	<input type="checkbox"/>	Attached	Date of Submittal: _____		

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NPDES GENERAL PERMIT AKG-31-5000
OIL AND GAS EXPLORATION FACILITIES
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Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:	<i>Wade D. Hutchings</i>	Date:	12.9.11
Printed Name:	Wade D. Hutchings	Title:	Alaska Asset Manager

Mail Completed NOI to EPA and ADEC at the following addresses:

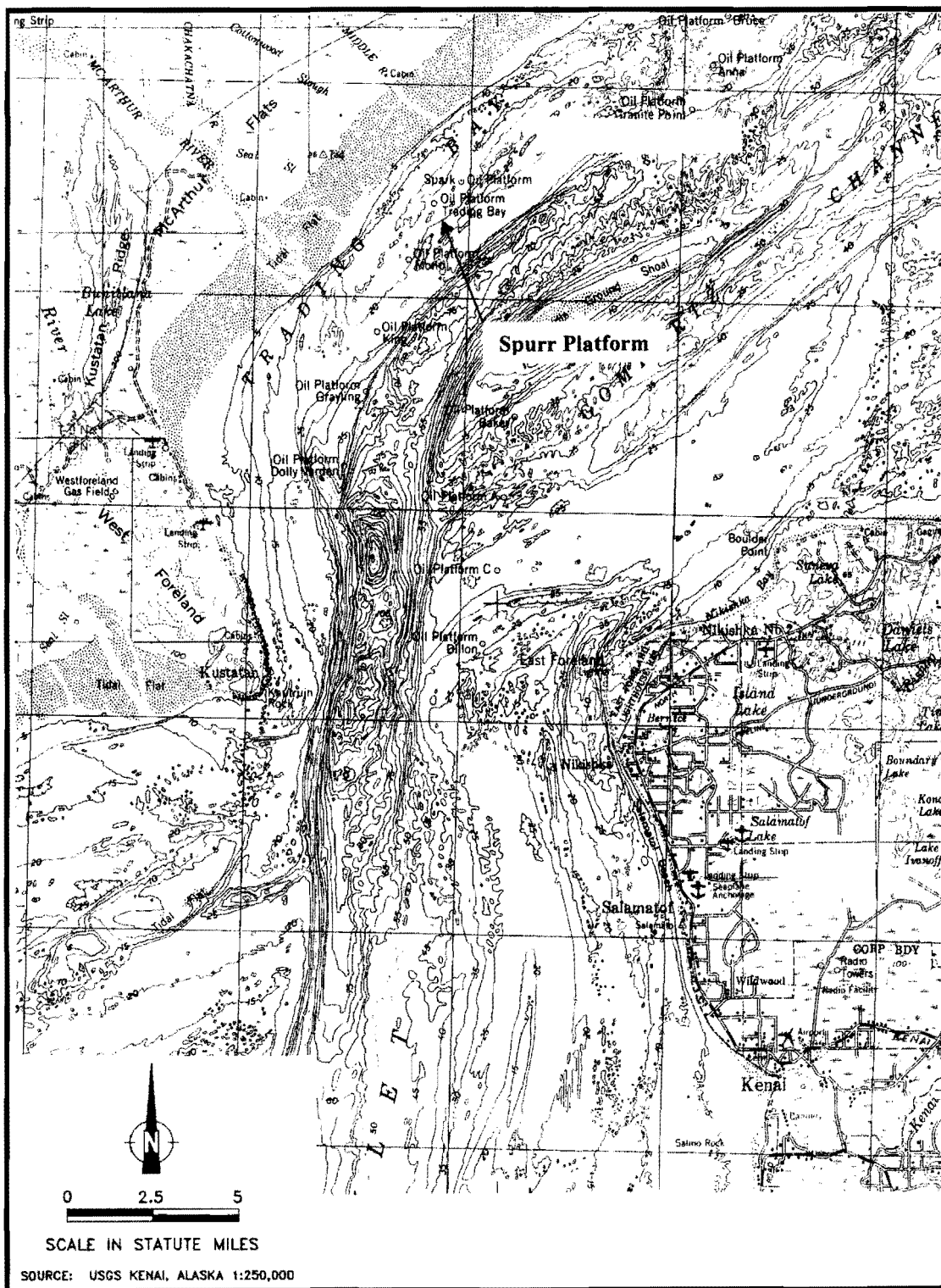
US EPA
1200 6th Avenue, M/S OWW-130
Seattle, WA 98101

ADEC, Water Division
555 Cordova Street
Anchorage, Alaska 99501

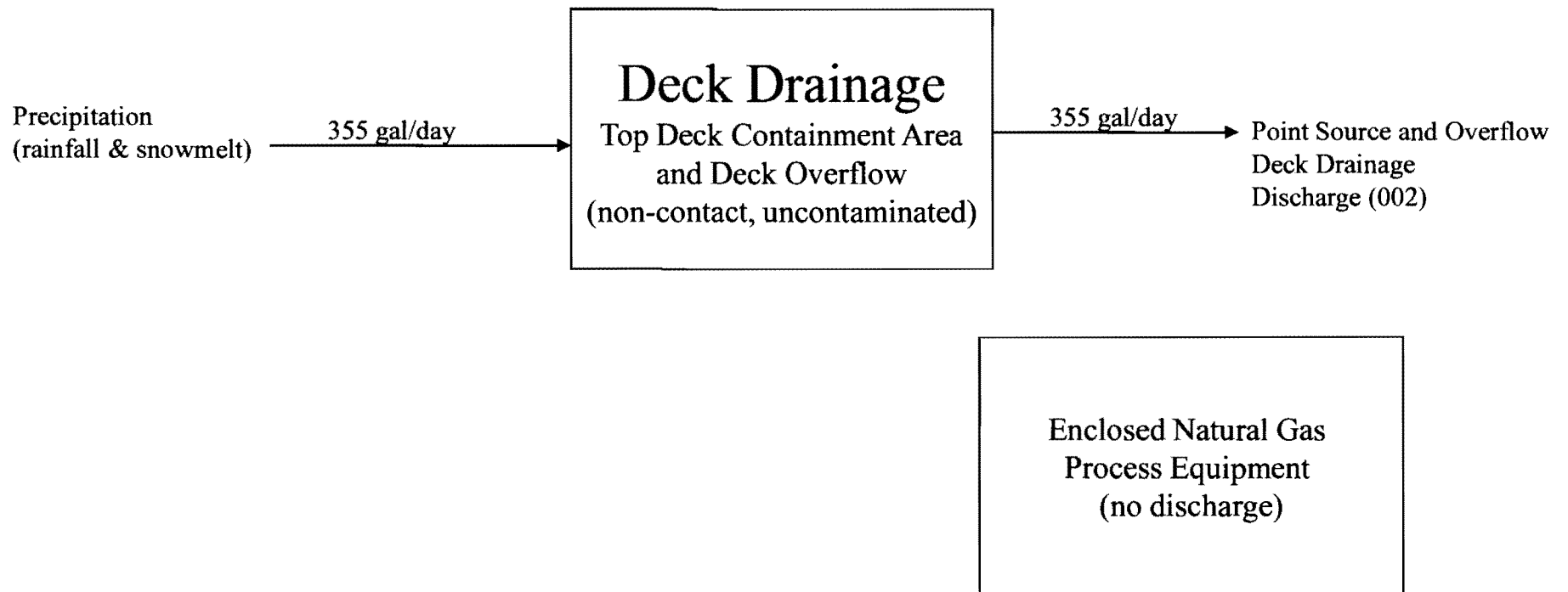
Spurr Platform Location Map

60° 55' 10" N Latitude

151° 33' 26" W Longitude



Line Drawing – Spurr Platform



Note:

Average flow is estimated and based on historical climate data from the Kenai FAA Airport. Specifically, an average of 19.07 in/year of total precipitation from 1949 to 2005. Flow has been estimated by the average rainfall and the surface area of the platform less grating.

I. Potential Release Types: There is one potential discharge category covered by the General NPDES Permit for the Spurr Platform. This waste stream is managed in such a way as to comply with permit limits and/or eliminate discharges to Cook Inlet. This facility is non-producing and unmanned.

- 1. Discharge 002 Deck Drainage:** Deck drainage consists of uncontaminated rainwater and snowmelt that is naturally shed and discharged directly to the Cook Inlet. These unmonitored discharges are segregated from the generator areas, which are located in weatherproof housing with spill containment berms. Leaks and spills into these berms are cleaned up by maintenance personnel and stored in drums. These discharges are segregated from other compliance operations to keep the deck drainage from becoming contaminated. The abandoned production wells are enclosed in weatherproof housing with spill containment berms. Leaks and spills into the berms are cleaned-up by maintenance personnel.

Drums containing fluids necessary for the safe operation of the facility are stored inside weatherproof housing and/or on drum "spill containment pallets". Empty drums are plugged and labeled "empty." Used drums are removed from the facility as soon as practicable.